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*Attorneys for Defendant Arnold Palacios in his Personal Capacity*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC,  
  
Plaintiff,

v.

Commonwealth of the Northern Mariana  
Islands, *et al.*,  
  
Defendants.

Case No. 24-cv-00001

**STIPULATION TO AMEND BRIEFING  
SCHEDULE FOR DEFENDANTS'  
MOTIONS TO DISMISS AND  
PLAINTIFF'S MOTION TO AMEND**

Hearing date: n/a  
Hearing time: n/a  
Judge: Hon. David O. Carter

Defendant Governor Arnold Palacios ("Governor Palacios"), in both his official and personal capacities, Defendant the Commonwealth of the Northern Maria Islands (together, "Defendants") and Plaintiff Imperial Pacific International (CNMI) LLC (together with Defendants, the "Parties"), by and through their counsel of record, hereby stipulate and agree:

1. Defendants filed their Motions to Dismiss Plaintiff's Second Amended Complaint on August 13, 2024. (ECF Nos. 59, 60, 61 (together, the "MTD's")).

2. On August 27, 2024, Plaintiff filed its opposition to the MTD's (ECF Nos. 63, 64), which would make Defendants' reply briefs due on September 3, 2024.

3. On August 27, 2024, Plaintiff also filed a motion seeking leave to file a Third Amended Complaint (ECF No. 65), which would make Defendants' opposition briefs due on September 10, 2024 and Plaintiff's reply brief due on September 17, 2024.

4. Given the relationship between the MTD's and Plaintiff's motion seeking leave to amend, Defendants would like to file their reply briefs to the MTD and oppositions to Plaintiff's motion for leave to amend simultaneously. This will also be more streamlined and efficient.

5. Accordingly, the Parties hereby request that the Court extend Defendants’ deadline to file their replies to the MTD’s to September 10, 2024—the same date that their oppositions to Plaintiff’s motion for leave to amend is due.

6. In addition, in the event that a Defendant files a single brief as both the reply to the MTD and opposition to Plaintiff's motion for leave to amend, the Parties request that the page limit for that brief be 25 pages—the regular page limit for an opposition brief.

Dated: August 30, 2024

\_\_\_\_\_/s/\_\_\_\_\_  
Michael Chen  
*Attorney for Plaintiff Imperial Pacific International (CNMI), LLC*

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3     *Attorneys for Defendant Arnold Palacios, in his personal capacity*  
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9     \_\_\_/s/\_\_\_\_\_  
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J. Robert Glass, Jr.

11     *Attorney for the Defendant the Commonwealth of the Northern Mariana Islands*  
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